

## **REMARKS**

The Office Action rejected claims 20, 24-26, 31, 35-37, 46-50, 52-53, 56-58, 59-62, 63, 75-83, and 87-88 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,404,445 issued to Galea, et al. (“Galea”) in view of U.S. Patent Application Publication 2004/0024790 by Everett (“Everett”), further in view of U.S. Patent Application Publication 2006/0064415 by Guyon et al. (“Guyon”), and further in view of U.S. Patent 6,035,300 issued to Cason, et al. (“Cason”). The Office Action also rejected 21 and 22 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of Everett, further in view of Cason, and further in view of U.S. Patent 6,564,218 issued to Roth (“Roth”). The Office Action also rejected claims 23, 32, and 51 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of Everett, further in view Cason, and further in view of Galea and further in view of U.S. Patent 7,093,263 issued to Sexton, et al. (“Sexton”). The Office Action also allowed claims 42-44 and 84-86. Applicants have not amended, added or canceled any claim. Accordingly, claims 20-27, 31-32, 35-38, 42-44, 46-53, 56-63, and 75-88 are pending in the application.

### **I. Allowed Claims**

The Office Action allowed claims 42-44 and 84-86. Applicants respectfully thank the Examiner for allowing these claims.

### **II. Rejection of Claims 20-27, 75, and 76**

The Office Action rejected claim 20 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 21-27, 75, and 76 depend directly or indirectly on claim 20.

Claim 20 recites a method for creating a description of a user interface that transacts with a database. The database has a data model that includes several entities. The method receives a request for the user interface from a client. After receiving the request, the method classifies the entities into entity types. In classifying, the method iteratively determines whether each entity satisfies a set of conditions. When an entity satisfies the set of conditions, the method classifies an entity as a particular entity type for which a user interface element is created within a particular window of a set of windows. The user interface element provides access to the entity through the user interface. The method creates the description of the user interface with at least one user interface element based upon the classification of the entities. The method distributes the description to the client in order to allow the client to generate user interface elements of the user interface that permits a user to transact with the database.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not render claim 20 unpatentable. *First*, the cited references fail to disclose or suggest classifying an entity as a particular entity type for which a user interface element is created within a window. The Office Action correctly states that Galea does not disclose “classifying the plurality of entities into entity types, the classifying comprising: iteratively determining whether each entity in the plurality of entities satisfies a set of conditions; and when an entity satisfies the set of conditions, classifying the entity as a particular entity type; and d) distributing the description to said client in order to allow said client generate user interface elements of said user interface that permits a user to interact with said database.” *See* Office Action, page 6.

However, the Office Action cites Everett as disclosing such classification. Applicants respectfully submit that Everett is not available as a reference under §103(a). Everett claims priority to U.S. Provisional Application 60/398,843 filed 7/26/2002. Therefore, the effective date of Everett is 7/26/2002. This application claims priority to U.S. Patent Application 09/618,390 filed 7/18/2000. As such, the priority date of this application precedes the effective date of Everett.

The Office Action also cites column 4, lines 29-57 of Cason stating that “primary keys are a first entity type and alternate keys and other types of keys are a second or other type of keys”. *See* Office Action, page 11. These cited lines describe a graphical representation of a database model. Specifically, the cited lines initially describe an “entity box” with a horizontal line that divides several attributes into two sets, namely key attributes and non-key attributes. The cited lines then describe choosing a primary key from a set of candidate keys. Applicants respectfully submit that drawing a box and choosing a primary key is not the classifying an entity as a particular entity type for which a user interface element is created within a window, as recited in the claim.

*Second*, the cited references fail to disclose or suggest classifying entities into entity types after receiving a request for a user interface from a client. In rejecting this feature, the Office Action cites column 5, lines 23-50 of Galea. *See* Office Action, page 4. However, Galea does not disclose or suggest such classification. Instead, in Galea, “When the user request information through the server 102, the compiled model is downloaded...”. *See* Galea, column 6, lines 56-58. Downloading a compiled model is not classifying entities into entity types after receiving a request for a user interface from a

client.

The Office Action also cites column 4, lines 29-57 of Cason. *See* Office Action, pages 9-10. However, as stated above, the cited lines describe a graphical representation of a database model. Furthermore, there is nothing in these cited lines to even suggest classifying entities into entity types after receiving a request for a user interface from a client, as recited in the claim.

Accordingly, Applicants respectfully submit that the cited references do not render claim 20 unpatentable. As claims 21-27, 75, and 76 are dependent directly or indirectly on claim 20, Applicants respectfully submit that claims 21-27, 75, and 76 are patentable over the references for at least the reasons discussed above for claim 20. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 20-27, 75, and 76.

### **III. Rejection of Claims 31-33 and 77-79**

The Office Action rejected claim 31 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 32, 33, and 77-79 depend directly or indirectly on claim 31.

Claim 31 recites a computer readable medium of a computer system implementing a server application. The computer readable medium stores a computer program which when executed by at least one processor of the computer system creates a description of a user interface that transacts with a database having a data model that includes several entities. The computer program includes a set of instructions for classifying the several entities into entity types. The set of the instructions for classifying

includes a set of instructions for iteratively determining whether each entity in the several entities satisfies a set of conditions. The computer program includes a set of instructions for classifying, when an entity satisfies the set of conditions, the entity as a particular entity type for which a user interface element is created within a particular window of a set of windows. The user interface element provides access to the entity through the user interface. The computer program includes a set of instructions for creating the description of the user interface with at least one user interface element based upon the classification of the several entities.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not render claim 31 unpatentable. The Office Action rejected claim 31 under a same rationale as claim 20. Accordingly, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a). Also, for reasons similar to those as stated above for claim 20, the cited references fail to disclose classifying an entity as a particular entity type for which a user interface element is created within a window. Furthermore, for reasons similar to those as stated above for claim 20, the cited references fail to disclose classifying entities into entity types after receiving a request for a user interface from a client.

Accordingly, Applicants respectfully submit that the cited references do not render claim 31 unpatentable. As claims 32, 33, and 77-79 are dependent directly or indirectly on claim 31, Applicants respectfully submit that claims 32, 33, and 77-79 are patentable over the references for at least the reasons discussed above for claim 31. In

view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 31-33 and 77-79.

#### **IV. Rejection of claims 35-38**

The Office Action rejected claim 35 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 36-38 depend directly on claim 35.

Claim 35 recites a method for generating a user interface on a client computer system that transacts with a database of a server computer system. The database has a data model that includes several entities. The method sends a request for the user interface from the client computer system to the server computer system. The method receives a description of the user interface at the client computer system. The description is based upon a set of conditions that classify the several entities into entity types. The classification of the entities into entity types is initiated by the request. When an entity satisfies the set of conditions, the classification includes classifying the entity as a particular entity type for which a user interface element is created within a particular window of a set of windows in the description of the user interface. The user interface element within the particular window provides access to the entity through the user interface. The method generates the user interface with at least one user interface element using the description of the user interface. The user interface allows the user to transact with the database.

Applicants respectfully submit that the cited references, alone or in combination, do not render claim 35 unpatentable. For instance, the cited references fail to disclose or

suggest (i) receiving a description that is based upon classification of entities into entity types, and (ii) classifying an entity as a particular entity type for which a user interface element is created within a window, as recited in the claim. The Office Action cites Galea in view Everett as applied to claim 20. *See* Office Action, page 17-20. Accordingly, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

Accordingly, Applicants respectfully submit that the cited references do not render claim 35 unpatentable. As claims 36-38 are dependent directly on claim 35, Applicants respectfully submit that claims 36-38 are patentable over the cited references for at least the reasons discussed above for claim 35. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 35-38.

#### **V. Rejection of claims 46-51**

The Office Action rejected claim 46 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 47-51 are dependent directly or indirectly on claim 46.

Claim 46 recites a system that includes a first computer system and a second computer system. The first computer system includes a database that has a data model including several entities. The server is communicatively coupled to the database. The server creates a description of a user interface that transacts with the database. The description is based on a set of conditions that classify the entities into entity types. When an entity satisfies the set of conditions, the classification includes classifying the entity as a particular entity type for which a user interface element is created within a particular

window of a set of windows in the description of the user interface. The user interface element within the particular window provides access to the entity of the data model through the user interface. The second computer system includes a client for receiving the description from the server and for generating the user interface as defined within the description.

Applicants respectfully submit that the cited references, alone or in combination, do not render claim 46 unpatentable. For instance, the cited references fail to disclose or suggest (i) receiving a description that is based on a set of conditions that classify entities into entity types, and (ii) classifying an entity as a particular entity type for which a user interface element is created within a window, as recited in the claim. The Office Action cites Galea in view Everett as applied to claim 20. *See* Office Action, page 23-24. Accordingly, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

Accordingly, Applicants respectfully submit that the cited references do not render claim 46 unpatentable. As claims 47-51 are dependent directly or indirectly on claim 46, Applicants respectfully submit that claims 47-51 are patentable over the cited references for at least the reasons discussed above for claim 46. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 46-51.

## **VI. Rejection of claims 52-57**

The Office Action rejected claim 52 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 53-57 are dependent directly or indirectly on claim 52.

Claim 52 recites a computer that includes a description specifying a user interface for transacting with data sets of a data store. The computer includes a browser for communicatively coupling to a server application of a different computer that provides a single point of access to the data store. The computer includes an application for generating user interface elements of the user interface by using the description and by retrieving a data set from the data store to populate at least one user interface element. The user interface elements are for displaying in the browser, where at least one user interface element is for receiving queries for the data store.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not disclose or suggest the computer of claim 52. *First*, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

*Second*, the cited references fail to disclose a computer that includes an application for generating a user interface by using the description and by retrieving a data set from a table of the data store to populate at least one user interface element. The Office Action cites column 5, lines 51-59 of Galea to suggest such a limitation. *See* Office Action, page 27. However, these cited lines describe a “configuration domain” and user interface tags that are compiled and downloaded onto a browser. As such, the cited

lines do not disclose or suggest such application for generating a user interface by using the description and by retrieving a data set from a table of the data store to populate at least one user interface element, as recited in the claim.

Accordingly, Applicants respectfully submit that the cited references do not render claim 52 unpatentable. As claims 53-57 are dependent directly or indirectly on claim 46, Applicants respectfully submit that claims 53-57 are patentable over the cited references for at least the reasons discussed above for claim 52. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 52-57.

## **VII. Rejection of claims 58 and 63**

The Office Action rejected claim 58 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claim 63 is dependent directly on claim 58.

Claim 58 recites a method. The method receives a first request for a first user interface of a first client to transact with a first data store. The method generates a first description to supply to the first client in order for the first client to generate the first user interface. The method receives a second request for a second user interface of a second client to transact with a second data store. The method generates a second description to supply to the second client in order for the second client to generate the second user interface. The first and second descriptions differ.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not disclose or suggest the method of claim 58.

*First*, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

*Second*, the cited references fail to disclose or suggest generating a first description in order for a first client to generate a first user interface and generating a second description in order for a second client to generate a second user interface. The Office Action cites column 4, lines 1-5 of Galea. The Office Action also states that the client 106 (first client) and client 108 (second client) can access the server for different user interfaces. *See* Office Action, pages 30 and 31.

Applicants respectfully submit that Galea does not disclose or suggest generating a first description in order for a first client to generate a first user interface and generating a second description in order for a second client to generate a second user interface. By contrast, Galea describes a compiled configuration model that is downloaded to a browser. *See* Galea, column 5, lines 56-59. However, there is no discussion in the cited section or anywhere in Galea about generating such first and second descriptions, as recited in the claim.

Accordingly, Applicants respectfully submit that the cited references do not render claim 58 unpatentable. As claim 63 is dependent directly on claim 58, Applicants respectfully submit that claim 63 is patentable over the cited references for at least the reasons discussed above for claim 58. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 58 and 63.

## **VIII. Rejection of claims 59-62**

The Office Action rejected claim 59 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 60-62 are dependent directly or indirectly on claim 59.

Claim 59 recites a method for providing descriptions of user interfaces to users. The method receives a first request from a first user. The first request includes a set of preferences specified by the first user. The method receives a second request from a second user. The second request includes a set of preferences specified by the second user. The first and second users specify different sets of preferences. The method generates a first description that is customized according to the first user's set of preferences to supply to the first user and a second description that is customized according to the second user's set of preferences to supply to the second user. The first and second descriptions are different based on the set of preferences specified by the users.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not disclose or suggest the method of claim 59. *First*, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

*Second*, the cited references fail to disclose or suggest generating a first description customized according to the first user's set of preferences and a second description customized according to the second user's set of preferences, where the first and second user interfaces are different. The Office Action cites column 4, lines 1-5 of

Galea. The Office Action also states that the client 106 (first client) and client 108 (second client) can access the server for different user interfaces. *See* Office Action, pages 37 and 38.

Applicants respectfully submit that Galea does not disclose or suggest generating a first description customized according to a first user's set of preferences and generating a second description customized according to a second user's set of preferences, where the first and second user interfaces are different. By contrast, Galea describes a compiled configuration model that is downloaded to a browser. *See* Galea, column 5, lines 56-59. However, there is no discussion in the cited section or anywhere in Galea about generating such first and second descriptions, as recited in the claim.

Accordingly, Applicants respectfully submit that the cited references do not render claim 59 unpatentable. As claims 60-62 are dependent directly or indirectly on claim 59, Applicants respectfully submit that claims 60-62 are patentable over the cited references for at least the reasons discussed above for claim 59. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 59-62.

## **IX. Rejection of claims 80-83**

The Office Action rejected claim 80 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claims 81-83 are dependent directly or indirectly on claim 80.

Claim 80 recites a computer implemented method for automatically generating a user interface to access a database. The method receives a request for the user interface

from a client. In response to the request, the method obtains a current data model describing several tables of the database. The method automatically generates a description of the user interface based on the current data model. The method sends the description to the client. The method receives a request for data from at least one table of the database to populate at least one user interface element of the user interface. The method retrieves the data from the database. The method sends the data to the client in order to allow the client to populate the user interface element. The client is then enabled to generate the user interface which permits a user of the client to transact with the database.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not disclose or suggest the method of claim 80. *First*, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

*Second*, the cited references, alone or in combination, fail to disclose or suggest automatically generating a description of a user interface based on a current data model. The Office Action cites Cason and Galea as disclosing such obtaining. However, there is no discussion in Cason and Galea about performing such automatic generation, as recited in claim 80.

Accordingly, Applicants respectfully submit that the cited references do not render claim 80 unpatentable. As claims 81-83 are dependent directly or indirectly on claim 80, Applicants respectfully submit that claims 81-83 are patentable over the cited references for at least the reasons discussed above for claim 80. In view of the foregoing,

Applicants respectfully request reconsideration and withdrawal of the rejection of claims 80-83.

**X. Rejection of claims 87 and 88**

The Office Action rejected claim 80 under §103(a) as being unpatentable over Galea in view of Everett, further in view Guyon, and further in view Cason. Claim 88 is dependent directly or indirectly on claim 87.

Claim 87 recites a computer implemented method for automatically generating a user interface to access a database. The method sends a request for the user interface to a server. The request includes a set of user preferences. In response to the request, the method receives a computer generated description specifying a user interface that is customized according to the set of user preferences. The user interface is for accessing a data store from the server. The method generates the user interface by creating user interface elements for the user interface based on the description, receiving data stored in the data store from the server, and populating at least one user interface element with the data. The generated user interface allows a user to interact with the data store using the user interface elements.

For at least the following reasons, Applicants respectfully submit that the cited references, alone or in combination, do not disclose or suggest the method of claim 87. *First*, for the same reason as stated above for claim 20, Applicants respectfully submit that Everett is not available as a reference under §103(a).

*Second*, the cited references, alone or in combination, fail to disclose or suggest sending a request for a user interface and receiving a computer generated description

specifying a user interface that is customized according to a set of user preferences. However, there is no discussion in Cason and Galea about sending the request and receiving the description, as recited in claim 80.

Accordingly, Applicants respectfully submit that the cited references do not render claim 87 unpatentable. As claim 88 is dependent directly or indirectly on claim 87, Applicants respectfully submit that claim 88 is patentable over the cited references for at least the reasons discussed above for claim 87. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 87 and 88.

## CONCLUSION

In view of the foregoing, it is submitted that all pending claims, namely claims 20-27, 31-32, 35-38, 46-53, 56-63, and 75-88 are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Applicants have submitted all known fees. Applicants believe that no additional fee is required for the submission of this Response. However, in the unlikely event that the Commissioner determines that additional fee, extension and/or other relief is required, Applicants petition for any required relief including extensions of time. Moreover, Applicants authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 50-3804** referencing APLE.P0004C.

Respectfully submitted,

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Dated: June 29, 2009

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